

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

NLS

UNITED STATES OF AMERICA : CASE NUMBER: 1-23-CR-00063
Plaintiff : JUDGE McFARLAND
Vs. : SENTENCING MEMORANDUM OF
FARHAN JAMI : DEFENDANT, FARHAN JAMI
Defendant :
: : : : :

BACKGROUND

On October 4, 2023, Mr. Jami plead guilty to Possession of an Unregistered Firearm-Destructive Device in Count One (1) of the Superseding Information. The matter is set for sentencing on March 12, 2024.

Mr. Jami requests that he be sentenced to a term of Probation.

RESTITUTION

Counsel has been in contact with a representative of Grange Insurance which paid its insured approximately \$54,000.00. It is Mr. Jami's intent to establish a payment structure so as to pay all restitution owed in his case.

LETTERS OF CHARCTER AND MENTAL HEALTH

Attached hereto as Exhibits B,C, and D are three letters.

Exhibit B is a report prepared by Therapist Taylore Chacanias who was assigned by Federal Pre Trial-Services. She states that Farhan attended all sessions. Ms. Chacanias further states; "Farhan Jami continuously presents as stable, in his emotionality, behaviors and mental health status.

Exhibit C is a letter written by Arib Hasan who is a close friend and business associate. Mr. Hason speaks to the strong character traits of Fahan.

Exhibit D is a letter from Raymond Correa, Farhan's Employer and Mentor.

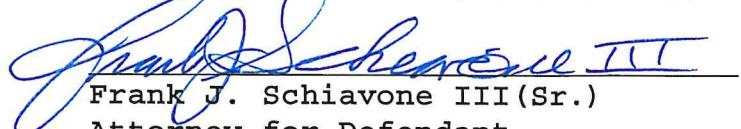
Exhibit A are Farhan's own words. Counsel requested that Farhan compose a document for my use, outlining why he should not be sent to prison. Upon receipt of Exhibit A, Counsel found Farhans words to be appropriate to include in the Defendants Memorandum without any editing by Counsel.

CONCLUSION

Farhan requests this Honorable Court to Sentence Mr. Jami to a term of Probation.

Respectfully Submitted,

F. JOSEPH SCHIAVONE, CO., L.P.A.

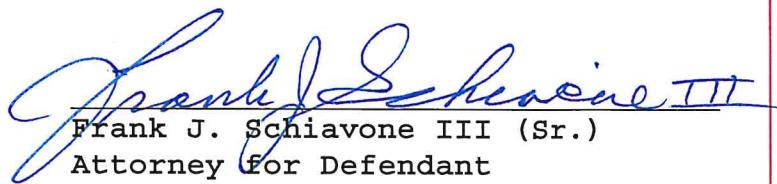


Frank J. Schiavone III (Sr.)
Attorney for Defendant

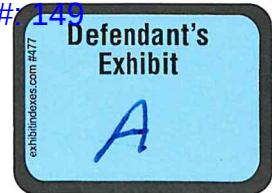
Supreme Court Number: 0032161
2 S. Third Street, Suite 300
Hamilton, OH 45011
(513) 863-4200

CERTIFICATE OF SERVICE

I hereby certify that a copy of the within was served upon the Assistant United States Attorney, on this 7th day of March, 2024.



Frank J. Schiavone III (Sr.)
Attorney for Defendant



Background

Part 1 Education

- East Meadow High School | Graduated Class of 2013
 - National Honor Society Member
 - President's Club - 100 hours of community service at Nassau University Medical Center's Pharmacy Department
- Long Island University | 12 credits remaining for Bachelor's Degree
 - Academic scholarship for accelerated Doctorate of Pharmacy
 - Industrial Psychology Major
 - Marketing Minor
 - Iota Nu Delta Fraternity Member

Part 2 Professional Employment

- Worked as a Sales Leader in Advertising, Software, and Manufacturing
 - Developed and executed sales operations at Compassionate Care Advisors - a marketing agency for medical professionals
 - Received the #2 fastest promotion to Account Executive in company history at BrightEdge Technologies - a marketing software for Fortune 500 companies
 - Managed and grew sales team from 1 to 15 members at BRH International - a glass manufacturer for consumer goods
- Launched a medical supplies business during covid to meet the demand of small medical facilities who were not being serviced by their normal suppliers due to supply chain issues.
- Launched a debt relief business post-covid to meet the demand of consumers who suffered from extenuating financial circumstances (medical emergency, lay-off, divorce).

Part 3 Family Background

- Parents immigrated to the United States in the 80's from Pakistan
- Before father passed away, he was a sales professional
- Mother, 60, works as a tutor/teacher
- 3 sisters
 - Nida Jami, 33, Resident Physician at ChristianaCare
 - Shafia Jami, 30, Compliance Officer at Esquire Bank
 - Hera Jami, 21, Student at Stony Brook University
- Mother's 4 brothers, my "close" uncles, supported my family after my father's death. All uncles are professionals, married, and have 2+ children.
- No criminal history in my close family.
- Extended family (~500 people) convenes for holidays, weddings, and religious events.

Part 4 Mental Health History

- In 2022 a psychiatrist diagnosed ADHD and prescribed generic adderall.
- In 2023 a psychiatrist diagnosed Anxiety and Depression and prescribed generic xanax and lexapro.
- Currently not taking adderall or lexapro and weaning off of xanax (attempting melatonin/ambien to help with sleep and avoid becoming benzo-dependent)

Part 5 Criminal History

- No violent crimes
- No hate crimes
- No substance abuse
- No repeat offenses

Part 6 Legal Arguments for Probation

- The burden of responsibility for this severe mistake is fully accepted and expressed in the timely acknowledgement and signing of the Plea, and deep willingness to rehabilitate any damage caused by my actions.
- Served two months in Butler County Jail and served over six months on house arrest.

- Abided by all conditions of release, and hope this serves as a reflection of my commitment to follow the rules of Probation.
- I have agreed to pay restitution, which has been reported to the Probation Officer.
- Given my commitment to adhere to the rules set forth by the Court, my understanding of the gravity of the offense and sincere remorse, my efforts in rehabilitation, and the other similar cases in the Southern District of Ohio where 100% involve significant criminal backgrounds or repeat offenders, the Statutory Provisions for Probation of 1-5 years are strongly supported.

Part 7 Mitigating Factors

- There is nothing I regret more than this severe mistake. It is not, in any way, a reflection of who I am. It is a betrayal of my character and an insult to the people who believe in me. I can't change the past, but I can correct course and change myself.
- My lack of criminal history speaks to my adherence and respect for the law and society. It is extremely sad that this major lapse in judgment will make me a felon. Still, I intend to abide by the rules set forth by the Court and do whatever is necessary to prove that I am worthy of expungement.
- The hardships I experienced while incarcerated in Butler County Jail will haunt me forever. It was my first time in jail, I was alone, 1,000 miles from home, and I did not eat or sleep for two days. I finally learned how to use the phone system and frantically said things I did not mean, in desperate hope of getting home to attend my sister's wedding, and those words were used against me in Court to increase my bond by a factor of 6, making it impossible to afford. In that Court, it was clear to me that I was racially profiled and painted as a terrorist. The prosecutor even falsely stated, on the record, that I had a prior felony conviction. The lack of attention to detail in my paperwork throughout the entire process was shocking. Two whole weeks after my arrest the Court called the Jail to finally correct my name and social security number, which were also incorrect on the warrants. I am traumatically driven to avoid everything which even remotely presents the risk of

going through that again.

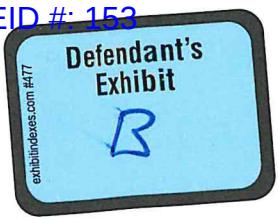
- Upon my release, I learned that my business partner, who I trusted with my livelihood, had embezzled funds and the business was at risk of being sued by vendors and on the brink of insolvency. Through extreme emotional pain and frustration, I pieced together what I could to keep the entity I worked on dearly for over two years alive. I suppose a positive takeaway is learning who (not) to trust.
- The loss of business income and the open-ended and wide-spectrum nature of the potential outcomes of this case have put me in an emotional and financial limbo. I am operating at minimal productivity with the constant fear of incarceration looming over my head. This is not a state of mind conducive to how I want to live my life.
- Due to the conditions of my release, I have missed several familial obligations and several networking opportunities. I missed birthdays and weddings. I missed business development lunches and partnership dinners. The opportunity and time loss makes me sick to my stomach.

Part 8 Rehabilitation Efforts

- Since my release, I have participated in mental health therapy. With the help of Dr. Chacanias, I have become aware of patterns in my past behavior which I am working to identify the triggers for and correct, to avoid any possibility of similar behavior in the future. It is extremely unfortunate that this is what it took to reach this level of awareness. However, I intend to face it and become a better person with it.

Part 9 Plan for the Future

- I wish to complete my Bachelor's Degree and maybe pursue an MBA or Masters in Psychology. I am "next in line" as my mother would say about getting married. I am not sure if it is in the cards for me, but I would like to try and find someone to spend my life with. I have to add here, because it really affects me personally, that I really would like to go for a run. I used to walk/run 2-3 miles everyday. I actually miss running so much. These aspirations are a reminder of what I had taken for granted and will keep me from doing anything this stupid again.



To whom it may concern,

My name is Taylore Chacanias; I am Farhan Jami's assigned psychotherapist through pretrial services. Farhan Jami has been actively participating in individual counseling since August 2023.

For the past 4-months, Farhan Jami has demonstrated effective participation in his sessions.

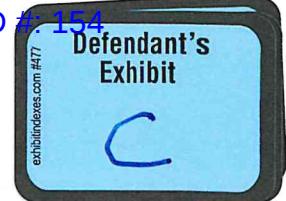
Farhan Jami has attended each of his scheduled sessions on-time and throughout the entire duration of the scheduled; additionally, if a scheduling concern presents itself, Farhan Jami ensures that he notifies me so that we can effectively reschedule his session.

During his counseling sessions, Farhan Jami actively engages with each topic, with both how it reflects in his life and how he can incorporate lessons learned into his daily life. Farhan Jami has demonstrated progress since August 2023; Farhan Jami has gained further insight to himself and his risk factors, appears to have a better understanding on regulating his emotions, and is motivated to continue exploring personal topics that can be improved through counseling treatment. Farhan Jami continuously presents as stable, in his emotionality, behaviors, and mental health status.

Sincerely,

Taylore Chacanias, Forensic Psychotherapist

New York Mental Health Group



Arib Hasan

307 Lorraine St
North Bellmore, New York, 11710

06/04/23

To the Honorable Judge,

I have known Farhan Jami for 15 years as a friend and almost 10 years as a business partner. I was shaken to my core hearing the news and details. I am honored to write this letter which I hope can be taken into deep consideration during this process. I do understand the seriousness of these allegations, but I hope and pray the court can show leniency.

Farhan is one of the most patient, caring and loving people I've had a chance to get to know. He has a loving mother and three sisters that he does his best to support. As a friend, I have never seen Farhan commit any violent acts or get into any physical altercations. We spend time by playing basketball, going to concerts or grabbing dinner. I am planning on getting married and Farhan asked if he could recite religious scriptures in the opening ceremony so there can be God's blessing present at the event.

As a business partner I've never seen Farhan be as consistent and committed to anything like he is with our company, Brightside Debt Relief. We help people who are having an extremely hard time with credit card debt. Farhan is so passionate about helping people who are in financial hardship. He has displayed so much empathy to our clients and their difficult situations and does everything in his power to help.

I humbly ask you for leniency while going through this process. I hope this letter explained the type of person Farhan is and the type of support he has moving forward. Despite the current situation, I still believe Farhan Jami to be an honorable individual, a valued member of my community and a good person.

Sincerely,

Arib Hasan

To Whom This May Concern,

I find myself in both deep sorrow and shock at the prospect of writing this letter on the behalf of my dear friend Farhan Jami. Anyone who has ever known him would never expect or understand how this has come to pass but I wanted to make sure it is known to those in a decision making authority how unlike Farhan this is and how he truly was – as someone who has known him for close to 2 decades now.

I am writing to express my unwavering support for my friend, Farhan Jami, whose character and actions throughout the years I have known him demonstrate a person who is far more than the current circumstances would suggest.

My name is Mubarak Shah and I have had the distinct pleasure of knowing him for two decades. We first met in elementary school and since then, our relationship has grown from acquaintances to a friendship that I treasure deeply.

Throughout the years, I have come to know Farhan as an individual of immense kindness, sincerity, and generosity. He has a unique ability to empathize with others, a trait that is clearly reflected in his interactions with people around him. He has consistently shown himself to be a caring and compassionate individual who is always willing to lend a hand, regardless of the situation or circumstance.

I have personally witnessed his dedication to helping those around him. Whether it was offering a listening ear to anyone in need, Farhan has always been a beacon of compassion and goodwill to those around him. It has always been evident to me that Farhan's natural disposition is to give rather than to receive, and to uplift those around him.

It's challenging to reconcile the Farhan I know with the situation he now finds himself in. I understand the gravity of the charges he is facing, and I believe in our justice system's pursuit of truth and fairness. However, I also believe that people are far more complex than their worst mistakes, and I firmly believe that Farhan's actions throughout his life paint a fuller picture of his character.

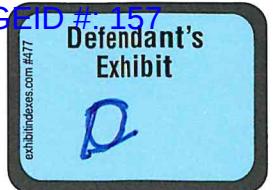
If I had to describe Farhan in a single sentence, I would say that he is a man who cares deeply about others, and consistently puts their needs before his own. I believe that this nature of his can contribute positively to society, and that this incident is not indicative of his true character.

I kindly ask you to consider Farhan's lifelong dedication to kindness and helping others, and the good that he has contributed to his community over the years. I believe that Farhan is capable of growth, rehabilitation, and positive contributions to society.

Thank you for taking the time to consider this perspective. I am confident that his character, a man of kindness, generosity, and empathy, is still intact. I am hopeful that his future actions will reflect the good-natured, helpful person we have known him to be for the past two decades.

With utmost respect,

Mubarak Shah, CPA



Raymond Correa
1 Schubert Ct
Huntington Station
NY 11746
Ray@compassionatecareadvisors.com
June, 1st 2023

The Honorable Judge

Subject: Character Reference for Farhan Jami

Dear Honorable Judge,

I am writing to provide a character reference for Farhan Jami, a person I have had the privilege of knowing and working with for many years. I first met Farhan when he was a young man, and I was his first full time employer. After starting his professional journey, we worked closely as I mentored him. His dedication and commitment to his roles were commendable and in about 8-10 months he was promoted to regional leader of the company I own, Company Care Advisors LLC.

After some time, Farhan moved to California and quickly went up the ranks at the new company he worked with. Our professional paths crossed again when he returned, and he decided to collaborate with me in a new venture. In the subsequent years we have continued networking and helping each other when we had ideas. I have had the chance to witness his outstanding growth from 22-30 plus years old and his qualities and character both as a professional and as a person have never come into question.

Farhan's contribution to society has been great. He consistently assists others, and his dedication towards the organizations he is a part of is commendable. Farhan's sense of service, hard work, commitment and his ability to uplift those around him are qualities that I deeply admire.

It is his personal attributes that make him truly exceptional. Farhan is a devoted family person. He assumed a significant role in his family after the untimely loss of his father as a teenager. Without hesitation he stepped in to fill the role as man of the house at a very young age. He takes care of his mother and provides constant support to his two younger sisters, the eldest is currently studying in medical school, and the others are pursuing successful careers. He has been a pillar of strength for his family.

I firmly believe that Farhan Jami is an asset to any community he is a part of and strengthens the fabric of society. His spirit, compassionate nature and commitment to family and community are something that any person can respect and command. That being said, whatever may have happened is definitely out of character and I hope you can find it in your heart to consider some leniency.

Thank you for considering this letter. I hope it provides a picture of Farhan Jami's character and demonstrates why I hold him in such high esteem.

Yours sincerely,

Best Regards,

Raymond M. Correa Sr.
Compassionate Care Advisors LLC
Managing Director
Office: 516-340-9995
Cell: 516-658-6111
Email: ray@corunit.com